

VIRGINIA: IN THE CIRCUIT COURT FOR THE CITY OF ALEXANDRIA

RENE ROMO, an individual;)

BENJAMIN WEAVER, an individual;)

Et al.,)

Plaintiffs,)

v.)

KEN DETZNER, in his official capacity)

as Florida Secretary of State, and)

JO BONDI, in her official capacity as,)

Attorney General,)

Defendants.)

THE LEAGUE OF WOMEN VOTERS)

OF FLORIDA;)

THE NATIONAL COUNCIL)

OF LA RAZA, et al.)

Plaintiffs,)

v.)

KEN DETZNER, in his official capacity)

as Florida Secretary of State, and)

JO BONDI, in her official capacity as,)

Attorney General,)

Defendants.)

Case No: MO12001573

Doc. No: 2165084

AFFIDAVIT OF THOMAS BROOKS HOFELLER

Thomas Brooks Hofeller states the following under oath:

1. I am of the age of majority, am competent to make this affidavit, and, except where specifically stated otherwise, have personal knowledge of the matters stated herein. I reside at [REDACTED], Alexandria, Virginia, 22307. Although my postal zip code is designated as an Alexandria postal zip code, my residence is actually two miles south of Alexandria City and located in Fairfax County, Virginia (a map showing my residence is attached hereto).

2. I hold a Ph.D. from Claremont Graduate University, where my major fields of study were American political philosophy, urban studies and American politics. I hold a B.A. from Claremont McKenna College with a major in political science.

3. I have given testimony as an expert witness in a number of important redistricting cases including, but not limited to, Gingles v. Edmisten, 590 F. Supp. 345 (N.D.N.C. 1984), *aff'd in part and rev'd in part* Thornburg v. Gingles 478 U.S. 30 (1986); State of Mississippi v. United States, 490 F. Supp. 569 (D.C.D.C. 1979); Shaw v. Hunt, 92-202-CIV-5-BR, U.S. District Court for the Eastern District of North Carolina, Raleigh Division (1993-4); Ketchum v. Byrne, 740 F.2d 1398, *cert. denied* City Council of Chicago v. Ketchum, 471 U.S. 1135 (1985), *on remand*, Ketchum v. City of Chicago 630 F. Supp. 551 (N.D. Ill. 1985); and Arizonans for Fair Representation v. Symington, CIV 92-0256, U.S. District Court Arizona (1992), *aff'd mem. sub nom.* Arizona Community Forum v. Symington, 506 U.S. 969 (1992).

4. I am currently engaged by the Republican National Committee (RNC) as an expert witness operating at the direction of RNC counsel. I am not engaged by any party in the Florida litigation contained in the caption of this case, nor am I testifying or assisting any party in this Florida litigation at this time.

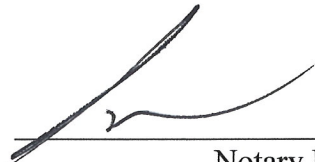
5. At 2:00 PM on Friday, September 28, at the RNC, I received an unsolicited phone call from Gerald Hebert asking me if I “had been involved in Florida redistricting”. I asked him what he meant by “involved”. He then explained that he had been “tasked” to find people who were involved in Florida redistricting for the ongoing redistricting litigation in that state. When I hesitated, he said that “you don’t have to answer, if you don’t want to.” I said that I did not want to comment further and that I would contact counsel on this issue. We exchanged a few pleasantries and then terminated the conversation.

6. To the best of my recollection, I have not been in contact, or exchanged data or maps, with any Florida legislators or members of their staffs, concerning Florida redistricting, since the release of the Census Bureau’s 2010 Decennial Redistricting Data File in early 2011. In early 2010, I attended a meeting at which I met Senator Mike Haridopolos. We did not discuss any matter of significance specific to Florida. I have not been in contact with him since that meeting.

DATED on March 8th, 2013.


Thomas Brooks Hofeller

SUBSCRIBED AND SWORN TO before me on March 8th, 2013, by Thomas Brooks Hofeller, a person either known to me or who identified himself as Thomas Brooks Hofeller by adequate means of identification.


Notary Public

MY COMMISSION expires
on the 31st day of October, 2013 #31446
In the City of Alexandria
Commonwealth of Virginia



